

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

Citivic Nominees Limited,

Defendant.

Adv. Pro. No. 12-01513 (SMB)

**SO ORDERED STIPULATION EXTENDING THE TIME BY WHICH CITIVIC  
NOMINEES LTD. MUST FILE ITS EXTRATERRITORIALITY SUBMISSION**

WHEREAS Plaintiff Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§78aaa *et seq.*, and the estate of Bernard L. Madoff, individually, commenced this Adversary Proceeding by filing a complaint (the “Complaint”) against Citivic Nominees Ltd. (“Defendant”) on April 12, 2012; and

WHEREAS, on December 10, 2014, the Court entered an Order Concerning Further Proceedings on Extraterritoriality Motion and Trustee’s Omnibus Motion for Leave to Replead and for Limited Discovery (the “Scheduling Order”), [08-01789, ECF No. 8800];

WHEREAS, Exhibits A and B were attached to the Scheduling Order and identifying the Extraterritoriality Defendants that contend counts brought under section 550(a) of the Bankruptcy Code should be dismissed based on the Extraterritoriality Order;

WHEREAS, Citivic was listed on Exhibit A;

WHEREAS, on December 31, 2014 pursuant to the Scheduling Order, Citivic submitted supplemental briefing on the Extraterritoriality Motion;

WHEREAS, on January 13, 2015, the Court entered a Stipulation and Order Modifying the Order Concerning Further Proceedings on Extraterritoriality Motion and Trustee's Omnibus Motion for Leave to Replead and for Limited Discovery [08-01789, ECF No. 8990];

WHEREAS, on February 24, 2015, the Court entered a Second Stipulation and Order Modifying the Order Concerning Further Proceedings on Extraterritoriality Motion and Trustee's Omnibus Motion for Leave to Replead and for Limited Discovery [08-01789, ECF No. 9350];

WHEREAS, the Trustee made his extraterritoriality submission in this action on June 29, 2015;

WHEREAS, on September 25, 2015, the Trustee filed a Motion For Leave to File an Amended Complaint adding Euroclear Bank S.A./N.V. as a Defendant in this proceeding (the "Trustee's Motion"), and which contemplates that the Trustee will dismiss Citivic as a defendant in this action upon service of Euroclear Bank S.A./N.V.;

WHEREAS, Citivic does not object to the Trustee's Motion;

WHEREAS, the deadline to object to the Trustee's Motion is set for October 12, 2015 with a hearing scheduled for October 28, 2015; and

WHEREAS, Paragraph 19 of the Scheduling Order provides, "This Order may be modified by the Court sua sponte or at the request of any party for good cause shown."

NOW, THEREFORE, subject to the approval of the Court, it is hereby STIPULATED AND AGREED that Paragraph 8 of the Scheduling Order is hereby modified to extend the time by which Citivic must file its "Five-Page Memorandum" to November 13, 2015, to the extent that Citivic remains a party by that date.

Dated: September 25, 2015  
New York, New York

BAKER & HOSTETLER LLP

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HAMILTON LLP

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SO ORDERED this 28<sup>th</sup> day of September, 2015.

/s/ STUART M. BERNSTEIN  
HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE